

The Honorable Timothy W. Dore
Chapter 13
Hearing Date: TBD
Hearing Time: 9:30 AM
Hearing Location: Courtroom 8106
Response Due: TBD

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

Jan Carol Little-Washington and Kevin Lynn
Washington,

Debtors.

Case No. 19-13722 - TWD

Chapter: 13

DEBTORS' MOTION FOR COURT
APPROVAL OF REFINANCE TO PAY
OFF CHAPTER 13 PLAN

COMES NOW, the Chapter 13 Debtors, ("Debtors"), by and through their attorney,
Chrisitna L Henry of Henry & DeGraaff, P.S., hereby move the Court for an order to refinance
their home to pay off their confirmed Chapter 13 Plan. This motion is based on the
files and records herein, the Debtors' supporting declaration with a copy of Loan Estimate
documents executed by Debtors attached thereto.

Debtors seek court approval allowing them to refinance their residence located at the
address commonly known as 5133 S Orcas St., Seattle WA 98118-2560, in the approximate
amount of \$655,000.00 which is intended to pay mortgage lien secured by Debtors' residence,
including:

DEBTORS' MOTION FOR COURT APPROVAL OF
REFINANCE - 1

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1 The balance owed on the first mortgage serviced by Rushmore including arrears, is in the
2 estimated amount of \$319,309.00 or amount otherwise sufficient to pay off the current 1st
3 mortgage;

4 **Amount to Trustee:** After payment of mortgage related lien(s), any other
5 claims, all outstanding property taxes, and any other amounts necessary to clear title, the
6 **Chapter 13 Trustee, Jason Wilson-Aguilar, shall receive** an amount sufficient to complete the
7 bankruptcy and cover administrative costs estimated to be approximately \$32,100.00. The
8 payment shall identify the Debtors' name, (Little-Washington), and case number, 19-13722
9 TWD. Upon receipt of the refinance proceeds, the Trustee is immediately authorized to disburse
10 the funds (less his fee) pursuant to the confirmed plan.
11

12 **Amount to Debtors:** The balance of the funds are to be released to the Debtors.

13 Debtors pray for an Order allowing them to enter into this Refinance Agreement.
14

15 Dated this January 7, 2022
16

17 HENRY & DEGRAFF, P.S.

18 By: /s/ Christina L Henry
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27 DEBTORS' MOTION FOR COURT APPROVAL OF
REFINANCE - 2

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